

WRIGHT, FINLAY & ZAK, LLP
Dana Jonathon Nitz, Esq.
Nevada State Bar No. 50
Chelsea A. Crowton, Esq.
Nevada State Bar No. 11547
7785 W. Sahara Avenue, Suite 200
Las Vegas, NV 89117
(702) 475-7964; Fax: (702) 946-1345
dnitz@wrightlegal.net
ccrowton@wrightlegal.net

Attorney for Defendants,

*First America Trustee Servicing Solutions, LLC, Residential Credit Solutions, Inc., and
Defendant/Counter-Claimant, The Bank of New York Mellon f/k/a The Bank of New York as
trustee for the Certificate-holders of CWMBC, INC., CHL Mortgage Pass-Through Trust 2007-
J2 Mortgage Pass-Through Certificates, Series 2007-J2*

**U.S. DISTRICT COURT
DISTRICT OF NEVADA**

ABET JUSTICE LLC
P.O. Box 81282
Las Vegas, NV 89180

Guetatchew Fikrou (Owner of ABET Justice
LLC)
P.O. Box 81282
Las Vegas, NV 89180
Cell (240) 938-3653
Email: gfikrou@yahoo.com

Plaintiffs,

v.

First America Trustee Servicing Solutions, LLC
6 Campus Circle, 2nd Floor
Westlake, TX 76262
(800) 795-5042

THE BANK OF NEW YORK MELLON FKA
The Bank of New York as trustee for the
Certificate-holders of CWMBC, INC., CHL
Mortgage Pass-Through Trust 2007-J2
Mortgage Pass-Through Certificates, Series
2007-J2 ("The Bank of NY")

c/o Residential Credit Solutions, Inc.
4708 Mercantile Drive

Case No.: 2:14-cv-00908-JCM-GWF

**STIPULATION FOR EXTENSION OF
TIME TO CONDUCT DISCOVERY
(FIRST REQUEST)**

FT. Worth, TX 76137

Residential Credit Solutions, Inc.
4708 Mercantile Drive
FT. Worth, TX 76137

DOES I through XI;

Defendants.

THE BANK OF NEW YORK MELLON F/K/A
THE BANK OF NEW YORK AS TRUSTEE
FOR THE CERTIFICATE-HOLDERS OF
CWMBC, INC., CHL MORTGAGE PASS-
THROUGH TRUST 2007-J2 MORTGAGE
PASS-THROUGH CERTIFICATES, SERIES
2007-J2,

Counter-Claimant,

vs.

ABET JUSTICE, LLC, a Limited Liability
Company; SUNRIDGE HEIGHTS, a Domestic
Non-Profit Corporation; NEVADA
ASSOCIATION SERVICES, INC., a Nevada
Corporation,

Counter-Defendants.

Defendants, First America Trustee Servicing Solutions, LLC (hereinafter “FATSS”), Residential Credit Solutions, Inc. (hereinafter “RCS”), and Defendant/Counter-Claimant, The Bank of New York Mellon f/k/a The Bank of New York as trustee for the Certificate-holders of CWMBC, INC., CHL Mortgage Pass-Through Trust 2007-J2 Mortgage Pass-Through Certificates, Series 2007-J2 (hereinafter “BONY”) (hereinafter collectively “Defendants”), by and through its attorney of record, Chelsea A. Crowton, Esq. of the law firm of Wright, Finlay & Zak, LLP, Plaintiff, Abet Justice, LLC, by and through their attorneys of record, Thomas Miskey, Esq. of Cooper Coons, Ltd., Guetatchew Fikrou, pro se, and Sunridge Heights, by and through its attorney of record, Edward D. Boyack, Esq. of Boyack & Taylor, hereby submit this Stipulation for Extension of Time to Conduct Discovery in accordance with LR 6-1 and LR 26-4.

1. The parties seek an extension of the discovery cut-off deadline. The current discovery deadline is July 28, 2015. The parties agree to extend the discovery cut-off deadline to October 28, 2015 or to the closest judicial deadline date available.
2. Nature of the Case
This action relates to residential real property located in Las Vegas, Nevada. The Complaint seeks a judicial determination that the HOA Sale conducted on April 11, 2014 extinguished all liens and encumbrances, including BONY's Deed of Trust.
3. Completed Discovery.
 - a) Plaintiffs, BONY, RCS, and FATSS have served their 26(a) Initial Disclosures.
 - b) Defendants have served written discovery to the Plaintiffs.
 - c) Plaintiffs have served responses to the written discovery.
 - d) Defendants have served a subpoena to NAS and have received the subpoenaed documents.
 - e) Defendants have served written discovery to HOA, but Defendants have not received responses to the written discovery from HOA.
4. Discovery that remains to be completed
 - a) HOA's responses to the written discovery.
 - b) Deposition of Plaintiffs.
 - c) Deposition of HOA.
 - d) Deposition of NAS.
5. Reason(s) why the deadline was not satisfied or the remaining discovery was not timely completed
 - a) All parties are involved in numerous, similar cases in which the scheduling of depositions has become complicated and need an extension of time to coordinate the scheduling of the parties' depositions.
 - b) The parties are awaiting pending dispositions regarding issues of law.
6. Proposed schedule for completing remaining discovery
 - 1) Discovery Cut-Off: October 28, 2015

2) Dispositive motions: November 27, 2015

3) Pretrial order: December 27, 2015

In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision of the dispositive motions or further order of the Court.

This is the parties' first request for extension of these deadlines and is not intended to cause any delay or prejudice to any party.

DATED this 21st day of July, 2015.

WRIGHT, FINLAY & ZAK, LLP

/s/ Chelsea A. Crowton, Esq.

Chelsea A. Crowton, Esq.

Nevada Bar No. 11547

7785 W. Sahara Avenue, Ste. 200

Las Vegas, Nevada 89117

Attorney for Defendants,

First America Trustee Servicing Solutions,

LLC, Residential Credit Solutions, Inc., and

Defendant/Counter-Claimant, The Bank of

New York Mellon f/k/a The Bank of New York

as trustee for the Certificate-holders of

CWMBC, INC., CHL Mortgage Pass-Through

Trust 2007-J2 Mortgage Pass-Through

Certificates, Series 2007-J2

DATED this 21st day of July, 2015.

BOYACK & TAYLOR

/s/ Edward D. Boyack, Esq.

Edward D. Boyack, Esq.

Nevada Bar No. 5229

401 N. Buffalo Drive #202

Las Vegas, Nevada 89145

Attorney for Counter-Defendant, Sunridge

Heights HOA

DATED this 23rd day of July, 2015.

COOPER COONS LTD.

/s/ Thomas Miskey, Esq.

Thomas Miskey, Esq.

Nevada Bar No. 13540

10655 Park Run Drive, Suite 130

Las Vegas, Nevada 89144

Attorney for Plaintiff/Counter-Defendant,

Abet Justice, LLC

DATED this 22nd day of July, 2015.

/s/ Guetatchew Fikrou

Guetatchew Fikrou, pro se

P.O. Box 777064

Henderson, Nevada 89077

gfikrou@yahoo.com

IT IS SO ORDERED.

DATED this 24th day of July, 2015.


UNITED STATES MAGISTRATE JUDGE